

EXHIBIT 27

DKT NO: X06-UWY-CV186046436-S	:	COMPLEX LITIGATION DKT
ERICA V. LAFFERTY	:	JUDICIAL DISTRICT WATERBURY
v.	:	AT WATERBURY, CONNECTICUT
ALEX EMRIC JONES	:	SEPTEMBER 14, 2022

DOCKET NO: X06-UWY-CV186046437-S
WILLIAM SHERLACH
v.
ALEX EMRIC JONES

DOCKET NO: X06-UWY-CV186046438-S
WILLIAM SHERLACH
v.
ALEX EMERIC JONES

**A.M. SESSION
VOLUME 1 OF 4**

BEFORE THE HONORABLE BARBARA N. BELLIS, JUDGE,
AND A JURY

A P P E A R A N C E S:

Representing the Plaintiff(s):

ATTORNEY CHRISTOPHER MATTEI
ATTORNEY JOSHUA KOSKOFF
ATTORNEY ALINOR STERLING

Representing Defendant(s):

ATTORNEY NORMAN PATTIS
ATTORNEY ZACHARY REILAND

Recorded By:
Kendyl Henaghan

Transcribed By:
Kendyl Henaghan
Court Recording Monitor
Waterbury Superior Court
300 Grand Street
Waterbury, Connecticut 06702

1 THE COURT: Good morning.

2 Good morning everyone, please be seated.

3 All right, we're on Day 2 of trial in the
4 Lafferty v. Jones matters. If counsel could please
5 identify themselves for the record.

6 ATTY. STERLING: Good morning, Your Honor, Alinor
7 Sterling for the Plaintiffs.

8 ATTY. KOSKOFF: Good morning, Your Honor, Josh
9 Koskoff for the Plaintiffs.

10 I believe Mr. Mattei stepped out.

11 ATTY. PATTIS: Morning, Judge, Norm Pattis; and
12 I've got Zach Reiland with me.

13 Could you introduce Attorney Reiland to the
14 jury, or if you think it's necessary, in case they
15 wonder what we - they haven't seen him.

16 THE COURT: Um, I can do that.

17 ATTY. PATTIS: Thank you.

18 ATTY. REILAND: Thank you, Your Honor.

19 THE COURT: No problem.

20 Attorney Reiland, did Attorney Pattis tell you
21 about the coffee station in Mr. Ferraro's office?

22 ATTY. PATTIS: I hadn't yet but I will brief him.

23 THE COURT: It's there for - for you, help
24 yourself at any time.

25 ATTY. REILAND: Thank you, Judge.

26 ATTY. PATTIS: And the unopened package of Oreo
27 cookies.

1 THE COURT: Mr. Ferraro opened that.

2 THE CLERK: It is open.

3 ATTY. PATTIS: Okay.

4 THE COURT: They won't last.

5 ATTY. PATTIS: All right.

6 THE COURT: All right, so, I did see the
7 memorandum - the brief that was filed on the - with
8 the Free Speech System and PQ P.R. document.

9 ATTY. STERLING: Yes, Your Honor.

10 THE COURT: So, how do you want to proceed on
11 that?

12 ATTY. STERLING: So, my understanding was the
13 Court wanted argument regarding sanctions on that
14 issue.

15 THE COURT: Well, I do but I just - I'm unclear
16 as to whether that one document that was produced is
17 the document that was referred to.

18 ATTY. STERLING: It's not the document that was
19 referred to. It is, however, responsive to our
20 discovery request and should have been produced quite
21 some time ago; and there's another document that was
22 included that should of been produced - I mean, it's
23 a document, I think it's dated 2007, and it was
24 responsive to our initial discovery request.

25 So, more of the same, Your Honor. And - so, we
26 definitely need to issue - discuss the sanctions
27 issue.

1 THE COURT: All right, let's address it then. The
2 good news is that your Jurors were all here early and
3 they're already down and waiting to go - and I assume
4 this is something that needs to be addressed now.

5 ATTY. STERLING: Just one moment, Your Honor.

6 THE COURT: Because if not, we can do it when
7 they're not waiting, but I just wasn't sure if
8 it . . .

9 ATTY. MATTEI: Well, Your Honor, I think the
10 issue is, I don't know what - the first witness today
11 is a Corporate Representative. Now, I don't intend to
12 get into anything related to PQ P.R., but I know the
13 Corporate Representative is aware of it and so I - we
14 need to make sure witness is educated and informed
15 about what the scope of any Court rulings may be on
16 the issue.

17 ATTY. PATTIS: I don't intend to cover - I don't
18 intend to cover it in my cross, so to speak.

19 ATTY. MATTEI: No, but I'm worried about it
20 coming out . . .

21 ATTY. PATTIS: He's in the room? If the Court can
22 issue whatever . . .

23 THE COURT: Well, why don't - do you want to just
24 speak to her, Attorney Pattis?

25 ATTY. PATTIS: Sure, may I?

26 THE COURT: Sure, and then this way we don't have
27 to keep the Jury standing by.

1 ATTY. STERLING: All right. Your Honor, and then
2 we can take this up at the Court's convenience?

3 THE COURT: Right.

4 ATTY. STERLING: Okay.

5 THE COURT: When they're . . .

6 ATTY. STERLING: Your Honor, we had also
7 filed . . .

8 THE COURT: Well, I just - wait for Attorney
9 Pattis so that he can hear what you're saying, if you
10 don't mind.

11 ATTY. PATTIS: We've covered it, Judge.

12 THE COURT: Okay, very well.

13 Okay, another issue?

14 ATTY. STERLING: One more filing this morning,
15 Your Honor; a bench brief regarding hearsay coming in
16 through the Corporate Representative, and no action
17 by the Court is necessary right now.

18 THE COURT: Okay.

19 All right, any housekeeping matters from your
20 side, Attorney Pattis?

21 ATTY. PATTIS: I think there're a couple exhibits
22 that we've agreed to - additional exhibits to mark,
23 I'll let Attorney Mattei speak to those.

24 THE COURT: All right, can I just see counsel
25 very briefly?

26 (SIDE BAR BEGINS)

27 ATTY. MATTEI: I'm sorry I was late, I cut my

1 finger and so I was trying to tape it. I went to the
2 bathroom to wipe it off, I'm sorry.

3 THE COURT: That's all right.

4 ATTY. MATTEI: Okay.

5 THE COURT: So, I've already made my fair share
6 of mistakes yesterday, and I know we're all rusty
7 because Covid, but you gotta just (indiscernible).

8 ATTY. PATTIS: You're right.

9 THE COURT: I know and I - you know, we didn't
10 try cases for two years and well, we're all a little
11 rusty, so . . .

12 ATTY. PATTIS: No, you're right.

13 THE COURT: Okay, no, I mean . . .

14 ATTY. PATTIS: I'm exhausted and it showed, and I
15 apologize to you. I didn't mean to intend that, to
16 convey disrespect.

17 THE COURT: If you're not on your feet with your
18 objections, I'm not gonna hear you. I'm gonna be like
19 my husband, who tunes me out half the time, so just
20 kinda stand up.

21 ATTY. PATTIS: Oh, Judge, now I'll feel right at
22 home.

23 THE COURT: Okay.

24 (SIDE BAR ENDED)

25 THE COURT: All right, any other housekeeping
26 matters?

27 ATTY. PATTIS: Yes, Judge. There uh - I think the

1 Plaintiff's are gonna submit an amended complaint
2 eliminating withdrawn counseling, defendants, and
3 consolidating the three complaints. I've reviewed it
4 and I have no objection to it.

5 THE COURT: Okay.

6 ATTY. STERLING: So, Your Honor, we can get that
7 filed today.

8 THE COURT: All right, perfect.

9 Anything else?

10 ATTY. PATTIS: Nothing from the Defense.

11 THE COURT: Okay.

12 THE CLERK: Your Honor, did want to put the newly
13 agreed upon exhibits on the record?

14 THE COURT: Do we have newly agreed upon exhibits
15 that should go on the record, or not?

16 ATTY. MATTEI: I could do that now, Your Honor.

17 THE COURT: Yeah, they can go on.

18 ATTY. MATTEI: We have a - and there may be more,
19 but what I was able to discuss with Attorney Pattis
20 this morning was Exhibit 10 and the sub-clips, which
21 is 'Shadow Government Strikes Again at Boston
22 Marathon' and then Exhibit 21 and it's sub-exhibit
23 and Exhibit 23 and it's sub-exhibit.

24 Then there are a number of other exhibits, Your
25 Honor, that I may use with the witness - as-to-which
26 there is agreement, but have not been offered, and
27 I'll just offer them at the time.

1 THE COURT: Very well.

2 ATTY. PATTIS: I thought we had an agreement on
3 43 as well?

4 ATTY. MATTEI: 43 as well, thank you.

5 THE COURT: All right, so ordered.

6 Anything else before we bring the panel out?

7 ATTY. PATTIS: No.

8 ATTY. MATTEI: No, Your Honor, thank you.

9 THE COURT: Okay.

10 ATTY. PATTIS: How you been?

11 ATTY. REILAND: I haven't seen you in a while.

12 ATTY. PATTIS: I know, it's been a bit.

13 ATTY. REILAND: (indiscernible) from Brittany but,
14 do we know who's gonna be after that?

15 ATTY. PATTIS: No, they were jerking me around on
16 that yesterday. They were telling me they had Paz be
17 here at 2:00, and then they started calling the
18 people out of the blue.

19 ATTY. MATTEI: All right, I'm gonna conduct these
20 examinations here, today. Microphone, yesterday, was
21 kind of getting in the way - is that alright?

22 THE COURT: Sure.

23 ATTY. PATTIS: They were bit-witnesses and then
24 they didn't have anything to say about damages, and
25 so, um - I could of thrown a hissy fit about it, but
26 what's the point?

27 ATTY. REILAND: Right.

1 ATTY. PATTIS: Let's get this thing out.

2 (JURY ENTERS)

3 THE COURT: Good morning.

4 JUROR: Good morning.

5 THE COURT: Good morning. You all brought some
6 good weather with you, today.

7 Good morning, everyone, well come back.

8 Good morning, I heard you were all early - I
9 love that, thank you for that. So, we got a nice
10 prompt start.

11 Counsel will stipulate that the entire panel is
12 present.

13 ATTY. PATTIS: Yes, Your Honor.

14 ATTY. MATTEI: Yes.

15 ATTY. KOSKOFF: Yes.

16 THE COURT: All right, make yourselves
17 comfortable, and I would just like to point out um -
18 that Attorney Reiland is joining the Defense table
19 today and I would also like to address one issue -
20 I'll wait for Mr. Ferraro to hand out the notepads.

21 All set?

22 THE CLERK: Yes, just have to get a pen, Your
23 Honor.

24 THE COURT: Thank you.

25 So, you will recall from my opening remarks
26 yesterday, the procedure that I set out that you
27 should follow if you saw or heard anything of a

1 prejudicial nature, or anything that might compromise
2 the proper conduct of the trial.

3 I haven't received any written notes from Mr.
4 Ferraro - which is the procedure that you should
5 follow, you will give him a written note and I would
6 deal with it on the record; so, therefore, I assume
7 there are no such issues. So, at any time during the
8 course of this trial, that is the procedure that you
9 should follow.

10 I will try to remember to inquire every morning
11 or to raise the issue every morning, but in case I
12 neglect to do so, it's your obligation if any such
13 issue arises, that you give a written note to Mr.
14 Ferraro so that I can deal with the issue on the
15 record, if necessary, with counsel, all right?

16 So, having said that, I think we are ready to
17 proceed, and Plaintiff's may call their next witness.

18 ATTY. MATTEI: Thank you and good morning, your
19 Honor.

20 The Plaintiff's call Brittany Paz.

21 THE COURT: Good morning, just watch your step
22 when you come up. You brought your own water too.

23 MS. PAZ: I did.

24 THE COURT: Nobody wants our water, Ron.

25 THE CLERK: Please remain standing and raise your
26 right hand.

27 Do you solemnly swear and sincerely affirm that

1 the evidence you shall give concerning this case
2 should be the truth, the whole truth and nothing but
3 the truth, so help you God or upon penalty of
4 perjury?

5 MS. PAZ: I do.

6 THE CLERK: Thank you, please be seated. I just
7 need you to state your name, slowly spell your last
8 name for the record and and your business address.

9 MS. PAZ: Sure, my name is Brittany Paz, P-A-Z;
10 and my business address is 4 Research Drive, Suite
11 402, Shelton, Connecticut 06484.

12 THE CLERK: Thank you.

13 THE COURT: You may inquire.

14 ATTY. MATTEI: Thank you, Your Honor.

15 Good morning, ladies and gentlemen.

16 Good morning, Ms. Paz.

17 MS. PAZ: Good morning.

18 ATTY. MATTEI: You and I have met before at your
19 deposition in this matter, correct?

20 MS. PAZ: Yes.

21 ATTY. MATTEI: Okay, and just to orient the Jury,
22 you were selected by Alex Jones to serve as a
23 Corporate Representative for Free Speech Systems in
24 this litigation, correct?

25 MS. PAZ: That's correct.

26 ATTY. MATTEI: Okay, now I'm not sure the Jury
27 know what a Corporate Representative is, so let's

1 just go through that a little e bit.

2 So, when a lawsuit is brought against a company,
3 like Free Speech Systems, the opposing party has the
4 opportunity to obtain information from that company,
5 correct?

6 MS. PAZ: Yes.

7 ATTY. MATTEI: And one of the ways they do that
8 is by asking the company to designate somebody most
9 knowledgeable within the company to testify about
10 certain topics, right?

11 MS. PAZ: Um, not necessarily within the company,
12 but designate a person to testify as to topics and be
13 knowledgeable on those topics, yes

14 ATTY. MATTEI: Okay, and so the company has the
15 ability to select somebody, right?

16 MS. PAZ: Yes.

17 ATTY. MATTEI: Okay - who's knowledgeable about
18 the topics that, in this case, the Plaintiff's wanted
19 to ask about, right?

20 MS. PAZ: Right.

21 ATTY. MATTEI: Okay and those topics, in this
22 case, were things like all the videos that Alex Jones
23 published about Sandy Hook, right?

24 MS. PAZ: Yes.

25 ATTY. MATTEI: Revenue to his company, right?

26 MS. PAZ: Yes.

27 ATTY. MATTEI: Okay.

1 The marketing activities that he and his company
2 engaged in?

3 MS. PAZ: Yes.

4 ATTY. MATTEI: Their practices for vetting facts,
5 that kind of thing?

6 MS. PAZ: Yes.

7 ATTY. MATTEI: Okay, and he selected you, is that
8 right?

9 MS. PAZ: Yes.

10 ATTY. MATTEI: All right.

11 The - the Plaintiff's had um - and no offense to
12 you, we didn't select you, right?

13 MS. PAZ: No, you didn't.

14 ATTY. MATTEI: Okay, that's not up to us, that's
15 up to Alex Jones.

16 MS. PAZ: Right.

17 ATTY. MATTEI: Okay.

18 And I think you mentioned this in one of your
19 answers, is that the idea here is that, in order for
20 the Plaintiff's and the Jury to be able to rely upon
21 information provided by the company, it has to
22 designate somebody who has knowledge about those
23 issues, right?

24 MS. PAZ: Who has - right, who has knowledge or
25 has become knowledgeable on the issues that you're
26 asking about, that's correct.

27 ATTY. MATTEI: Right, and obviously we can't have

1 somebody up here who doesn't know anything about it.

2 MS. PAZ: Right.

3 ATTY. MATTEI: Okay, because then the Jury
4 wouldn't be able to rely upon it.

5 MS. PAZ: Correct.

6 ATTY. MATTEI: Okay, and the person that the
7 company designates - am I right, they have an
8 independent duty to discover the facts so that they
9 can testify under oath about them, right?

10 MS. PAZ: Right, I - and I did have a duty to
11 become knowledgeable about the topics that were
12 inquired about by the Plaintiff's.

13 ATTY. MATTEI: Right, and not just accept what
14 somebody says to you as the truth, you actually have
15 to figure out whether it is, in fact, true, right?

16 MS. PAZ: Um, well as to what the company knows
17 or knew at the time, I did make such efforts to
18 corroborate information from various sources - so,
19 yes.

20 ATTY. MATTEI: And it was your duty to do that?

21 MS. PAZ: I thought so, yes.

22 ATTY. MATTEI: Okay, and that's because, you
23 know, you wouldn't want just to be kind of - the
24 company just parrotting what Alex Jones were to tell
25 you, right?

26 MS. PAZ: Um, to the extent that that was
27 possible, yes, I tried to do that.

1 ATTY. MATTEI: Right, but Alex Jones is the 100
2 percent owner of Free Speech Systems, right?

3 MS. PAZ: Yes.

4 ATTY. MATTEI: Okay, and by-the-way, we've been
5 referring to Free Speech Systems as Infowars, is that
6 how you refer to it as well?

7 MS. PAZ: I do, and I refer to them
8 interchangeably. I think that's how I refer to it in
9 my internal documents as well.

10 ATTY. MATTEI: Okay.

11 MS. PAZ: But it is officially Free Speech
12 Systems.

13 ATTY. MATTEI: Right, and so if we refer to
14 Infowars - for example, you refer to Infowars or Free
15 Speech Systems refer to Infowars, what we're talking
16 about is Free Speech Systems.

17 MS. PAZ: That's correct.

18 ATTY. MATTEI: That's the Defendant - or one of
19 the Defendants in this case.

20 MS. PAZ: Right.

21 ATTY. MATTEI: All right.

22 And so, we presented - we asked Free Speech
23 Systems to select somebody to testify knowledgably
24 about these issues, right?

25 MS. PAZ: Yes, you did.

26 ATTY. MATTEI: Do you remember when we did that?

27 MS. PAZ: Uh, I don't recall the date.

1 ATTY. MATTEI: Would it have been January of this
2 year, does that sound right?

3 MS. PAZ: I know that's when I was selected; it
4 was in late January.

5 ATTY. MATTEI: Okay, and when you're testifying
6 here today, and when you testified under oath in your
7 deposition, you're doing that as Free Speech Systems,
8 right?

9 MS. PAZ: Yes, as I sit her today, I am the
10 corporation, Free Speech Systems.

11 ATTY. MATTEI: Okay. So, if at any point you say
12 to this Jury 'I don't know', what you're saying is
13 'Free Speech Systems doesn't know', right?

14 MS. PAZ: Right.

15 ATTY. MATTEI: Okay.

16 So, let's talk about how it was that you were
17 selected. To justify that Alex Jones selected you,
18 right?

19 MS. PAZ: Um, well obviously there were
20 discussions that are privileged discussions amongst
21 attorneys who should be selected - and I know that
22 there were issues finding somebody; but ultimately, I
23 was approved by Mr. Jones.

24 ATTY. MATTEI: Right, he's the only one within
25 Infowars that would actually have the authority to
26 designate somebody to testify on his behalf, right?

27 MS. PAZ: Right, because he's the one that owns

1 the company.

2 ATTY. MATTEI: Okay. So, we don't need to put up
3 what he chose here.

4 MS. PAZ: Right.

5 ATTY. MATTEI: Okay, and when he chose you - you
6 said in January of 2022?

7 MS. PAZ: Right, it was like, late January, I
8 can't recall the exact date.

9 ATTY. MATTEI: Okay, at that time you had no
10 substance of knowledge about any of the topics that
11 you were supposed to testify about, right?

12 MS. PAZ: Correct, I have never been involved
13 with the company prior to that date. I had no
14 involvement with the litigation either here or in
15 Texas prior to that.

16 ATTY. MATTEI: Right, so the answer to my
17 question is - correct, you had no knowledge when he
18 selected you of any of the topics that you were gonna
19 testify about, right?

20 MS. PAZ: Prior to January, that's correct.

21 ATTY. MATTEI: Right and even as of January, when
22 you were selected - you were selected the last week
23 of January?

24 MS. PAZ: Right, so I didn't begin my review of
25 the material until after I was officially retained to
26 do that; so, it would have been sometime in the last
27 week of January that I started review of the

1 material.

2 ATTY. MATTEI: Oh okay, because you're not an
3 Infowars employee?

4 MS. PAZ: No, I'm not.

5 ATTY. MATTEI: Okay and what happened was, the
6 last week of January, Attorney Pattis gave you a
7 call, right?

8 MS. PAZ: Yes, he did.

9 ATTY. MATTEI: Okay, and he offered you \$30,000
10 to testify on behalf of Infowars, right?

11 MS. PAZ: No. So, initially . . .

12 ATTY. MATTEI: Ms. Paz, hold on a second ma'am.

13 MS. PAZ: Um-hmm.

14 ATTY. MATTEI: When you were deposed in this
15 case, isn't it true that you testified that the last
16 week of January, Mr. Pattis offered you \$30,000 you
17 said it was fair, and you accepted it?

18 MS. PAZ: No, what I said was . . .

19 ATTY. MATTEI: Wait, hold on a second, you didn't
20 testify that in your deposition?

21 ATTY. PATTIS: Objection.

22 MS. PAZ: That was not the initial . . .

23 ATTY. PATTIS: She should be - can she be
24 shown . . .

25 MS. PAZ: . . . number. So, no.

26 ATTY. MATTEI: Okay.

27 ATTY. PATTIS: Can she be shown the material that

1 she's allegedly being impeached from?

2 THE COURT: Overruled, it's proper.

3 ATTY. MATTEI: I've just asked her at this point
4 whether you testified to that in your deposition,
5 that Attorney Patis offered you \$30,000 and that you
6 thought that was fair.

7 MS. PAZ: I don't recall testifying to that
8 because that wasn't the original number; but if
9 you'd like to show me, I'd look at it.

10 That's fine.

11 ATTY. MATTEI: I would be happy to do that, but
12 your recollection right now, is that that's not the
13 original number?

14 MS. PAZ: That's correct.

15 ATTY. MATTEI: What was the original number he
16 offered you?

17 MS. PAZ: So, I believe that the original number
18 was \$25,000 or \$20,000 and then there was further
19 negotiation after that given how much time we thought
20 would be required; between traveling down to and
21 Texas - because there were Texas depositions as well,
22 as well as the depositions here.

23 And so, there was a re - there was a back-and-
24 forth about the number, and then the number finally
25 landed at \$30,000.

26 ATTY. MATTEI: Okay, so he . . .

27 MS. PAZ: But that wasn't the initial number.

1 ATTY. MATTEI: Okay, so the initial number - to
2 your recollection, the last week of January was
3 \$20,000 or \$25,000?

4 MS. PAZ: Right.

5 ATTY. MATTEI: You negotiated it up to \$30,000?

6 MS. PAZ: Correct.

7 ATTY. MATTEI: And Alex Jones agreed to pay that,
8 right?

9 MS. PAZ: Correct.

10 ATTY. MATTEI: Okay, and at the time he agreed to
11 pay you that, you didn't know anything about anything
12 relating to Infowars, right?

13 MS. PAZ: Correct.

14 ATTY. MATTEI: Okay, and at time he agreed to pay
15 you that, you knew that you were going to be
16 testifying under oath within a couple of weeks,
17 right?

18 MS. PAZ: Uh, yes. I think that the dates in
19 Texas were in mid-February - there were two
20 dates . . .

21 ATTY. MATTEI: Okay.

22 MS. PAZ: . . . and I wasn't sure about the dates
23 in here in Connecticut.

24 ATTY. MATTEI: All right, but you knew that
25 within two weeks, you were going to be expected to
testify under oath on behalf of Free Speech Systems,
27 knowing absolutely nothing about Free Speech Systems,

1 right?

2 MS. PAZ: Yes.

3 ATTY. MATTEI: Okay, and I think you would agree
4 with me that, that wasn't entirely reasonable to
5 expect you to be able to do that, right?

6 MS. PAZ: I think said that at the deposition,
7 that it was extremely difficult, and I don't think
8 there was a lot of time to get familiar with a lot of
9 the material.

10 ATTY. MATTEI: Right, and just so that the Jury
11 understands how it is that they landed upon you,
12 you're a lawyer, right?

13 MS. PAZ: I am an attorney, yes.

14 ATTY. MATTEI: Okay, and your first job out of
15 law school, you were hired by Attorney Pattis to work
16 at his firm?

17 MS. PAZ: Uh, yes.

18 ATTY. MATTEI: Okay, and you worked there for
19 about six years, correct?

20 MS. PAZ: Uh, five years.

21 ATTY. MATTEI: Five years.

22 MS. PAZ: Yes.

23 ATTY. MATTEI: 2012 to 2017/2018?

24 MS. PAZ: Uh, so, I was hired in November 2012,
25 and I left in January 2018. So, about five years.

26 ATTY. MATTEI: Okay, five years.

27 Then you went off on your own for a while . . .

1 MS. PAZ: Yes.

2 ATTY. MATTEI: . . . then you started at another
3 firm, right?

4 MS. PAZ: Yes.

5 ATTY. MATTEI: And the week before he called you
6 up, the last week of January, you'd been let go from
7 your prior firm, right?

8 MS. PAZ: Uh, yes. I had started my own - my own
9 firm like, the week before.

10 ATTY. MATTEI: And, to my understanding, but just
11 to be clear, that wasn't your choice, your firm let
12 you go.

13 MS. PAZ: Right.

14 ATTY. MATTEI: Okay, and you didn't have another
15 job lined up, but you were gonna start your own solo-
16 practice.

17 MS. PAZ: Well, I didn't intend to go to another
18 job, I intended to be in solo-practice, yes.

19 ATTY. MATTEI: Okay, but that's when he called
20 you and offered you the \$20-25,000?

21 MS. PAZ: Yes.

22 ATTY. MATTEI: All right.

23 And when - you agree with me that, um prior to
24 you being retained, Alex Jones had selected a number
25 of people to serve as Corporate Representatives for
26 him right?

27 MS. PAZ: I am aware there were a couple of other

1 Corporate Representatives that were designated.

2 ATTY. MATTEI: Well, there were more than a
3 couple, right?

4 MS. PAZ: I think there were at least three in
5 the Texas litigation.

6 ATTY. MATTEI: Well, there was another one in
7 this case, you knew that, right?

8 MS. PAZ: Yes, I do recall there being another
9 one in this case.

10 ATTY. MATTEI: Right, and all of the Corporate
11 Representatives that Alex Jones had previously
12 designated to testify for him were long-standing
13 employees of Infowars, right?

14 MS. PAZ: Yes, they were actually employed in
15 various different functions.

16 ATTY. MATTEI: He had a guy named Rob Dew; who is
17 one of his longest serving, most senior employees at
18 the time, serve as a Corporate Representative,
19 correct?

20 MS. PAZ: Rob Dew did do a Corp. Rep. depo - or a
21 couple, I think.

22 ATTY. MATTEI: And Rob Dew, just to be clear,
23 you've come to learn, is one of his most trusted and
24 most senior employees at Infowars, correct?

25 ATTY. PATTIS: Objection - objection, Judge, he's
26 - um, rela - that misstates the evidence.

27 May I speak to Attorney Mattei for a moment?

1 THE COURT: You may.

2 ATTY. PATTIS: (indiscernible).

3 ATTY. MATTEI: Oh, I know.

4 ATTY. PATTIS: Objection.

5 ATTY. MATTEI: At time Rob Dew served as the
6 Corporate Representative, he was one of Mr. Jones's
7 most trusted and most senior employees, correct?

8 MS. PAZ: Um, I think that's fair.

9 ATTY. MATTEI: I mean, you've read depositions in
10 this case where Alex Jones's employees have described
11 Rob Dew as his right-hand-man, right?

12 MS. PAZ: I have, yes.

13 ATTY. MATTEI: Okay.

14 He had Daria Karpova; long-time employee of Free
15 Speech Systems serve as a Corporate Representative,
16 right?

17 MS. PAZ: Yes.

18 ATTY. MATTEI: She's the producer of the 'Alex
19 Jones Show'?

20 MS. PAZ: Yes.

21 ATTY. MATTEI: Okay.

22 He had Michael Zimmerman serve as a Corporate
23 Representative, and he's a long-time head of IT at
24 Infowars, right?

25 MS. PAZ: Uh, I'm not sure what his actual
26 position is, but I know he's been employed there for
27 quite some time.

1 ATTY. MATTEI: And of all of these people - you'd
2 agree with me, have far more knowledge about the
3 company and its operations than you did at the time
4 you were selected, correct?

5 MS. PAZ: At the time I was selected?

6 ATTY. MATTEI: Yes.

7 MS. PAZ: Well, sure, they worked there.

8 ATTY. MATTEI: Right, and when it came time to
9 designate a Corporate Representative for trial in
10 this case, Alex Jones didn't designate any of those
11 people, he designated you.

12 MS. PAZ: I think he did it because he had no
13 other choice.

14 ATTY. MATTEI: Well, wait a second.

15 Alex Jones is the head of the company, right?

16 MS. PAZ: Right.

17 ATTY. MATTEI: Okay, he could of chose himself,
18 correct?

19 MS. PAZ: Well, I'm not gonna go into the . . .

20 ATTY. MATTEI: No, no, I just . . .

21 MS. PAZ: . . . internal discussions between
22 counsel.

23 ATTY. MATTEI: I'm not asking you to go into
24 internal discussion, but you know that because Alex
25 Jones had the authority to select anybody he wanted
26 to represent his company here before this Jury, he
27 could of selected himself, correct?

1 MS. PAZ: He is going to testify here, but I
2 don't think . . .

3 ATTY. MATTEI: Your Honor, I'm gonna move to
4 strike as non-responsive.

5 THE COURT: So ordered.

6 ATTY. MATTEI: Ms. Paz you're a lawyer, correct?

7 MS. PAZ: Could he have, yes.

8 ATTY. MATTEI: Ma'am excuse me, hold on a second.

9 You're a lawyer, correct?

10 MS. PAZ: Yes.

11 ATTY. MATTEI: You understand that your
12 obligation here is to just respond to the questions I
13 ask you, right?

14 MS. PAZ: Yes.

15 ATTY. MATTEI: Those are the rules, right?

16 MS. PAZ: Yes.

17 ATTY. MATTEI: All right, so can we just agree
18 that you'll do that?

19 MS. PAZ: Yes.

20 ATTY. MATTEI: Okay, so, the question I asked
21 you, is to confirm that if Alex Jones wanted to - the
22 gentleman who started this company and has had
23 complete control over it for the last however-many
24 years, he could of come and testified to this Jury on
25 behalf of his company, correct?

26 MS. PAZ: Could he have, sure.

27 ATTY. MATTEI: All right.

1 All right, so, when you were called about this,
2 you never heard of Free Speech Systems, right?

3 MS. PAZ: Um, I don't think I never heard of it,
4 I think - like all of us, we've seen news articles.

5 ATTY. MATTEI: You've heard of Infowars?

6 MS. PAZ: Right.

7 ATTY. MATTEI: You never heard of Free Speech
8 Systems?

9 MS. PAZ: Did I know that Infowars was Free
10 Speech, no, probably not.

11 ATTY. MATTEI: So, is the answer no?

12 MS. PAZ: Yes.

13 ATTY. MATTEI: Okay.

14 You didn't know anything about his business,
15 correct?

16 MS. PAZ: No.

17 ATTY. MATTEI: You didn't know any employees?

18 MS. PAZ: No.

19 ATTY. MATTEI: Okay.

20 You knew nothing about his revenue, correct?

21 MS. PAZ: No.

22 ATTY. MATTEI: You didn't know anything about how
23 he made his money?

24 MS. PAZ: No.

25 ATTY. MATTEI: You've heard of Alex Jones, but
26 you didn't really know anything about him, right?

27 MS. PAZ: Right.

1 ATTY. MATTEI: You've never spoken to him?

2 MS. PAZ: No.

3 ATTY. MATTEI: Okay.

4 You've never been to the website, Infowars.com?

5 MS. PAZ: No.

6 ATTY. MATTEI: Or any of his websites?

7 MS. PAZ: No.

8 ATTY. MATTEI: You've never watched the 'Alex

9 Jones Show'?

10 MS. PAZ: No.

11 ATTY. MATTEI: Okay.

12 You've never watched a single Infowars video?

13 MS. PAZ: No.

14 ATTY. MATTEI: All right.

15 So, you're saying you knew nothing of any

16 substance about Infowars or Alex Jones?

17 MS. PAZ: Prior to being retained, no.

18 ATTY. MATTEI: All right, all right.

19 And this case had ben going on for three-plus

20 years by that point, right?

21 MS. PAZ: Quite a few years, yes.

22 ATTY. MATTEI: All right.

23 Now, you said you negotiated it up to \$30,000,

24 but then you'd been paid more for your preparation

25 for trial in this case, right?

26 MS. PAZ: Uh, I did invoice an additional fee,

27 yes.

1 ATTY. MATTEI: And you've been paid?

2 MS. PAZ: No.

3 ATTY. MATTEI: Okay.

4 I think what you're expecting to be paid is
5 another \$7,500 for your testimony in this case.

6 MS. PAZ: Yes.

7 ATTY. MATTEI: And the fee is just a flat fee,
8 you're not getting paid by the hour, right?

9 MS. PAZ: Right, I'm not getting paid by the
10 hour.

11 ATTY. MATTEI: And in addition to knowing nothing
12 of substance about the company, you didn't have any
13 experience in media, correct?

14 MS. PAZ: No.

15 ATTY. MATTEI: You didn't have any experience in
16 online business?

17 MS. PAZ: No.

18 ATTY. MATTEI: No experience in supplement sales,
19 right?

20 MS. PAZ: No.

21 ATTY. MATTEI: No experience in journalism?

22 MS. PAZ: No.

23 ATTY. MATTEI: Okay, you never served as a
24 Corporate Representative before?

25 MS. PAZ: No.

26 ATTY. MATTEI: And you had two weeks to prepare
27 for your first deposition, right?

1 MS. PAZ: Approximately.

2 ATTY. MATTEI: There is no written agreement
3 between you and Infowars?

4 MS. PAZ: Right.

5 ATTY. MATTEI: They just gave you a check.

6 MS. PAZ: Well, we negotiated the fee and then I
7 was paid pursuant to those discussions, so, yes.

8 ATTY. MATTEI: And who signed the check?

9 MS. PAZ: I'm honestly not sure.

10 ATTY. MATTEI: Okay.

11 MS. PAZ: I don't remember.

12 ATTY. MATTEI: All right.

13 MS. PAZ: I'm sorry.

14 ATTY. MATTEI: It's all right, I'll refresh your
15 recollection of that.

16 So, let's start with the . . .

17 ATTY. PATTIS: (indiscernable) Gilligan's Island
18 show where they spend about four weeks putting
19 (indiscernable).

20 ATTY. MATTEI: . . . basics about Infowars.

21 So, it's located in Austin, Texas, right?

22 MS. PAZ: Yes.

23 ATTY. MATTEI: You've been down there since you
24 started?

25 MS. PAZ: I did go there, yes.

26 ATTY. MATTEI: Okay.

27 You had a deposition down there and you also

2 MS. PAZ: Yes, I had two depositions, I saw the
3 warehouse and I saw the office.

4 ATTY. MATTEI: And the studio?

5 MS. PAZ: Yeah - uh, I don't think I went back to
6 the studio.

7 ATTY. MATTEI: Oh, you didn't?

8 MS. PAZ: No.

9 ATTY. MATTEI: Okay

10 And Free Speech Systems is s for-profit
11 supplement sales business, correct?

12 MS. PAZ: Supplements amongst other products,
13 yes.

14 ATTY. MATTEI: They sell merchandise?

15 MS. PAZ: Yes.

ATTY. MATTEI: They sell like, t-shirts?

17 MS. PAZ: Yes.

18 ATTY. MATTEI: They sell like, clothing
19 accessories?

20 MS. PAZ: Yes.

21 ATTY. MATTEI: Um, okay.

22 But, like - I don't know, would you say 80
23 percent of all Free Speech Systems revenue is from
24 supplement sales?

25 MS. PAZ: Um, I mean, I don't know the number. I
26 know that it's a big part it and they certainly
27 started with the supplement sales; so, it is a big

1 part of their revenue, I just don't - I can't say the
2 number, what the number is. You're putting an 80
3 percent number on it, and I don't know what that is,
4 but it is a big percentage.

5 ATTY. MATTEI: Well, I mean, I'm asking you
6 because you're the Corporate Representative
7 responsible for understanding the revenue of Free
8 Speech Systems, right?

9 MS. PAZ: Correct.

10 ATTY. MATTEI: So, let me not put my number on
11 it, let me just ask you to put Free Speech Systems
12 number on it.

13 What percentage of revenue of Free Speech
14 Systems is from Alex Jones's supplement sales?

15 MS. PAZ: I can't recall as I sit here today, I'm
16 sorry.

17 ATTY. MATTEI: Okay, so, you've been deposed?

18 MS. PAZ: Yes.

19 ATTY. MATTEI: You've prepared?

20 MS. PAZ: To the best of my ability, yes.

21 ATTY. MATTEI: You're here as Free Speech
22 Systems?

23 MS. PAZ: Yes.

24 ATTY. MATTEI: Okay, so, as the company, right?
25 What you're saying is, right now, as you sit here
26 right now, the company doesn't know what percentage
27 of its revenue comes from supplements sales, right?

1 MS. PAZ: Think I said, as I sit here, I don't
2 recall. If you'd like to show me a document, I'd be
3 happy to review it.

4 ATTY. MATTEI: No, ma'am.

5 MS. PAZ: But as I sit here today, I just don't
6 recall.

7 ATTY. MATTEI: I don't want to show you a
8 document, because it's not my job to give you . . .

9 THE COURT: Just make sure you let her finish.

10 ATTY. MATTEI: Oh, I'm sorry.

11 I'm sorry, please finish what you're saying.

12 MS. PAZ: I just said, as I sit here today, I
13 just don't recall. I think this was a topic in one of
14 the depositions, but I just don't recall.

15 ATTY. MATTEI: Okay, but you understand it's not
16 my - it's not my job to give you information here
17 today. It's your job to give information to the Jury,
18 right?

19 MS. PAZ: Yes.

20 ATTY. MATTEI: So, I'm just saying, as you sit
21 here right now, Free Speech Systems can't tell this
22 Jury, without reviewing something, what percentage of
23 its sales are from supplements, correct?

24 MS. PAZ: Correct, I just don't recall.

25 ATTY. MATTEI: Right.

26 So, in the - I'm sorry, you said you didn't see
27 the studio, right?

1 MS. PAZ: No, I think they were on-air when I was
2 there; so, I don't think I went back to the studio
3 portion.

4 ATTY. MATTEI: How many studios does Infowars
5 have?

6 MS. PAZ: I'm sorry, I don't recall the number.
7 I'm not sure what the number is.

8 ATTY. MATTEI: Can you ballpark it?

9 MS. PAZ: There's a few studios there, I just
10 don't know the exact number.

11 ATTY. MATTEI: Are there more than five?

12 MS. PAZ: I - I don't recall the number.

13 ATTY. MATTEI: How many warehouses does Free
14 Speech Systems operate?

15 MS. PAZ: Uh, we had - when I say we, I mean Free
16 Speech. Free Speech had the one warehouse, um - and
17 that's the warehouse that housed all of the products
18 and merchandise.

19 ATTY. MATTEI: Okay, and that's right near the
20 office, right?

21 MS. PAZ: It's very close by, yes.

22 ATTY. MATTEI: And all the products - you're
23 talking about all the supplements?

24 MS. PAZ: Supplements, hats, shirts, etc.

25 ATTY. MATTEI: Orders come in online, they get
26 processed through the warehouse, warehouse packs them
27 up, ships them off, right?

1 MS. PAZ: Yes.

2 ATTY. MATTEI: All right.

3 So, let's talk - let's go to Exhibit - and I do
4 not want to make the mistake I was making yesterday,
5 Your Honor, about what's submitted and what's not;
6 I'll drive Mr. Ferraro crazy. So, let me make sure.

7 I am going to go - I'm just gonna do it this
8 way. Can you put up the first slide from the opening,
9 yesterday? (indiscernible)

10 PARALEGAL: Um, that's 300.

11 ATTY. MATTEI: Okay, 300.

12 THE COURT: We do like keep him on his toes
13 though, so, it's okay.

14 THE CLERK: No, no, I - yeah, that is not marked
15 full yet.

16 ATTY. MATTEI: Okay, we're gonna - it's by
17 agreement, Your Honor.

18 ATTY. PATTIS: No objection - no objection to
19 300, Judge.

20 THE COURT: All right, so ordered.

21 ATTY. MATTEI: See, I need it.

22 Now, this is coming up here -

23 I'm sorry, if you can you maybe just pull that
24 up, thank you.

25 Um, you'd agree with me that the studio depicted
26 here is actually not the current studio, this is one
27 of the other studios, yes?

1 MS. PAZ: Um, like I said, I didn't see the
2 studios when I was there; but I believe that's
3 accurate, yes.

4 ATTY. MATTEI: Okay, well, I don't want you to -
5 I don't want you to guess.

6 Have you seen picture before?

7 MS. PAZ: Yes, I've seen this picture.

8 ATTY. MATTEI: Okay, did you ask anybody at
9 Infowars, 'Hey is this a current studio/Which studio
10 is this'?

11 MS. PAZ: I didn't - I didn't ask anything
12 specific about this photo, no.

13 ATTY. MATTEI: Okay.

14 All right, well, why don't we do this, let's
15 pull up - let's put that one beside it, like put
16 side-by-side with um, the exhibit from yesterday that
17 we showed during my opening.

18 This is one screen (indiscernible), I'm so sorry
19 if I don't remember the number. Not that one, it's um
20 - I'll figure it out later.

21 So, did you go to the warehouse?

22 MS. PAZ: I did go to the warehouse, yes.

23 ATTY. MATTEI: Okay.

24 Now, when talk about Infowars and Free Speech
25 Systems, we said Alex Jones is the 100 percent owner,
26 correct?

27 MS. PAZ: Yes.

1 ATTY. MATTEI: Complete control over the company,
2 correct?

3 MS. PAZ: Yes.

4 ATTY. MATTEI: All right.

5 He has authority over all Infowars operations?

6 MS. PAZ: Yes.

7 ATTY. MATTEI: All right.

8 He's in charge and everybody answers to him?

9 MS. PAZ: Yes, that is the structure.

10 ATTY. MATTEI: All right.

11 In fact, almost everybody reports to him?

12 MS. PAZ: Yes, I - the only structure there is,
13 is that Alex is on the top and he kind of will filter
14 out what is needed - but you know, to the extent that
15 that actually gets done is the question, I guess.

16 ATTY. MATTEI: So - and you've heard, um - you
17 know who David Jones is?

18 MS. PAZ: Dr. Jones?

19 ATTY. MATTEI: Dr. David Jones?

20 MS. PAZ: Yes.

21 ATTY. MATTEI: Yes, he's a dentist, right?

22 MS. PAZ: Yes.

23 ATTY. MATTEI: And he's Alex Jones's father?

24 MS. PAZ: Yes.

25 ATTY. MATTEI: Okay, and he's been deeply
26 involved with Infowars since what, about 2012/2013?

27 MS. PAZ: Uh, what do you mean by deeply

1 involved?

2 ATTY. MATTEI: Employed.

3 MS. PAZ: Um, I don't think that he's employed by
4 Infowars.

5 ATTY. MATTEI: Okay, so, does Infowars know
6 whether he's employed?

7 MS. PAZ: He doesn't receive any compensation
8 from Infowars directly. So, um, I don't - I don't
9 think that he's employed by Free Speech Systems.

10 ATTY. MATTEI: Okay, so, let's just see if we can
11 nail this down.

12 As of this very moment, right now . . .

13 MS. PAZ: Um-hmm.

14 ATTY. MATTEI: . . . can Free Speech Systems
15 testify whether Alex Jones's dad, Dr. David Jones, is
16 an employee?

17 MS. PAZ: Of Free Speech Systems?

18 ATTY. MATTEI: Yes.

19 MS. PAZ: He's - I don't believe he's an
20 employee, so no.

21 ATTY. MATTEI: So, okay.

22 When was he first an employee?

23 MS. PAZ: Of Free Speech Systems?

24 ATTY. MATTEI: Yes.

25 MS. PAZ: I don't recall a date.

26 ATTY. MATTEI: Has he ever been an employee?

27 MS. PAZ: According to my review of the

1 documents, he has not ever been em - he's not ever
2 been paid by Free Speech Systems. So, according to
3 Free Speech Systems, I don't think he's ever been an
4 employee of Free Speech Systems.

5 ATTY. MATTEI: Ms. Paz, you reviewed David
6 Jones' s deposition in this case?

7 MS. PAZ: I believe I did, I don't recall his
8 exact testimony, but I did review it.

9 ATTY. MATTEI: You don't recall his testimony
10 that he was - he did become employed by Free Speech
11 Systems in around 2013?

12 MS. PAZ: I don't recall, I'm sorry.

13 ATTY. MATTEI: You don't recall his - an exhibit
14 that he presented to us during that deposition in
15 which he said he was being paid \$400,000 a year?

16 MS. PAZ: I don't recall that, no.

17 ATTY. MATTEI: Okay.

18 Do you recall a part of his deposition - this is
19 what I was tying to get to, do you recall the part of
20 his deposition where he said that Free Speech Systems
21 is a single-talent business - that talent being Alex
22 Jones?

23 MS. PAZ: Yes, I do recall that.

24 ATTY. MATTEI: Okay, you recall that part.

25 And Alex Jones has total authority to hire and
26 fire anybody at Free Speech Systems, correct?

27 MS. PAZ: Yes.

1 ATTY. MATTEI: He has authority to overrule and
2 decision that's made by a subordinate?

3 MS. PAZ: Yes.

4 ATTY. MATTEI: He has total authority over
5 Infowars's finances?

6 MS. PAZ: Yes.

7 ATTY. MATTEI: He's not accountable to any board
8 of directors or any governing authority?

9 MS. PAZ: No, he's not.

10 ATTY. MATTEI: Right. He has 100 percent control
11 over Free Speech Systems's revenue and how it's
12 allocated, correct?

13 MS. PAZ: Sure, correct.

14 ATTY. MATTEI: Okay, and I know you said that you
15 weren't prepared to say what percentage of Infowars's
16 revenue is from supplements, but I think the best you
17 can do is that it's a large majority?

18 I'm not trying to . . .

19 MS. PAZ: Yes, it is a very big portion, it is
20 probably the majority - probably a significant
21 majority, I just can't say the number.

22 ATTY. MATTEI: Okay.

23 Now, it does have other sources of income; one
24 is advertising income, correct?

25 MS. PAZ: Right.

26 ATTY. MATTEI: And donations?

27 MS. PAZ: Yes.

1 ATTY. MATTEI: Okay. So, for example, Alex Jones
2 will say, 'Look, even if you don't want buy iodine,
3 you can make a donation directly', right?

4 MS. PAZ: Yes.

5 ATTY. MATTEI: And one of the ways he offers
6 people to make donations is in crypto currency. Do
7 you know what that is?

8 MS. PAZ: Uh, yes. Such as bitcoin, etc. Yes.

9 ATTY. MATTEI: Exactly, and I had to figure this
10 out myself, but it's not actually cash - it's like,
11 almost like a stock or an asset, right? You give some
12 - by-the-way, this is not one of the topics you were
13 asked to prepare on . . .

14 MS. PAZ: It's - yeah, it's not my forte.

15 ATTY. MATTEI: . . . but I do - it is a source
16 of revenue; I do need to ask you about it.

17 It's kind of like a stock or an asset. Somebody
18 can give Infowars, ya know, 500 bitcoins, and it has
19 a value, right?

20 MS. PAZ: Right, I think it has a market value,
21 which changes and fluctuates.

22 ATTY. MATTEI: Correct.

23 MS. PAZ: Right.

24 ATTY. MATTEI: Correct, and when somebody gives
25 crypto currency donations to Free Speech Systems, it
26 actually goes directly to Alex Jones personally,
27 correct?

1 MS. PAZ: Uh, if it's a donation?
2 ATTY. MATTEI: Yeah.
3 MS. PAZ: Uh, bitcoin, um - I believe so, yes.
4 ATTY. MATTEI: Right, and he doesn't tell his
5 audience that, right?
6 MS. PAZ: Does he tell his audience where it
7 goes . . .
8 ATTY. MATTEI: Right.
9 MS. PAZ: . . . or what is being done with it?
10 ATTY. MATTEI: No, no - he doesn't tell his
11 audience that when you donate bitcoin to Free Speech
12 Systems, it's actually going right to me. He doesn't
13 tell them that.
14 MS. PAZ: He doesn't tell anybody where it goes
15 or what he does with it, or - right.
16 ATTY. MATTEI: Oh whoa, hold on a second. He
17 tells his audience that the donations are going to
18 Free Speech Systems, correct?
19 MS. PAZ: I don't know that he's said they go to
20 Free Speech Systems.
21 ATTY. MATTEI: You do or you don't know?
22 MS. PAZ: I - I don't know that, no.
23 ATTY. MATTEI: Okay.
24 You've been to the Infowars.com website?
25 MS. PAZ: Have I visited it?
26 ATTY. MATTEI: Yeah.
27 MS. PAZ: Yeah.

1 ATTY. MATTEI: There's a donation page where you
2 can donate crypto currency, correct?

3 MS. PAZ: I believe so, yes.

4 ATTY. MATTEI: Yeah, and it says 'Support the
5 Infowar - Support Infowars, donate here', right?

6 MS. PAZ: Support Infowars, yes.

7 ATTY. MATTEI: Yeah.

8 MS. PAZ: Support the production, support the
9 business, the show, help us stay on the air - that
10 kind of thing.

11 ATTY. MATTEI: That kind of thing.

12 MS. PAZ: Right.

13 ATTY. MATTEI: Except once somebody donates, it
14 doesn't go to that, it goes to Alex Jones, right?

15 MS. PAZ: Well, Alex Jones needs to stay on the
16 air - so, I mean, I don't know if that's what he
17 means by it, but that's how it's being advertised.

18 ATTY. MATTEI: But the point is, that it goes to
19 his personal account, not the Free Speech Systems
20 account.

21 MS. PAZ: As far as where is the money kept, yes.

22 ATTY. MATTEI: Thank you.

23 So, the way Free Speech Systems attracts
24 customers for its supplements, is by serving them
25 free content, right? Like the show and the website,
26 and then when they arrive for the content, directing
27 them to the online supplement store, right?

1 MS. PAZ: Right, there are various ads and
2 banners on all of the articles, on all of the
3 individual pages, on the videos, and then you click
4 on those ads and that will take you to the Infowars
5 store.

6 ATTY. MATTEI: Right, and that's the business
7 model. You come to Infowars.com where there's the
8 news, right?

9 MS. PAZ: Well, right. If you come to the home
10 page, right, and you can click on various articles
11 from the homepage.

12 ATTY. MATTEI: Right, so, just follow me here.
13 So, Alex Jones has a huge audience, right?

14 MS. PAZ: Oh, sure, yeah.

15 ATTY. MATTEI: The audience accesses his content
16 either through the radio - and we'll get to that.

17 MS. PAZ: Um-hmm.

18 ATTY. MATTEI: But let's just talk about online
19 for a second.

20 MS. PAZ: Okay.

21 ATTY. MATTEI: The audience - this huge audience
22 accesses his content - including the content we're
23 here about, the content that said Sandy Hook was a
24 hoax, right?

25 MS. PAZ: Yeah, all of the content.

26 ATTY. MATTEI: They do it online. That big
27 audience comes to Infowars.com, right?

1 MS. PAZ: Correct.

2 ATTY. MATTEI: Or Banned Video - or Banned.Video,
3 his video site, right?

4 MS. PAZ: Right.

5 ATTY. MATTEI: Or, in earlier days, Prison Planet
6 TV, right?

7 MS. PAZ: Right.

8 ATTY. MATTEI: Okay, PrisonPlanet.com, right?

9 MS. PAZ: Right, there are a few websites.

10 ATTY. MATTEI: News Wars, that's another one?

11 MS. PAZ: Yup.

12 ATTY. MATTEI: Infowars Europe?

13 MS. PAZ: Yes.

14 ATTY. MATTEI: Okay, they come to all those
15 websites, and then when they get there, Alex Jones
16 sends them to the store, right?

17 MS. PAZ: Well, not send them, you have to click
18 on the ad - but yes, there are ads all over, ya know,
19 on all of the articles, on all of the videos, there
20 are ads all over. So, I mean, you don't send them
21 there, you have to click on it.

22 ATTY. MATTEI: You have to click on it?

23 MS. PAZ: Right.

24 ATTY. MATTEI: But actually, for Infowars.com,
25 the first thing you see when you pull up the website
26 is an ad. You have to click through the ad to get
27 even get to their website, right?

1 MS. PAZ: You mean when you first go to
2 Infowars.com?

3 ATTY. MATTEI: Yeah. Like, if I typed in
4 Infowars.com right now . . .

5 MS. PAZ: Um-hmm.

6 ATTY. MATTEI: . . . and it takes me to the
7 website, the first thing I'm gonna see - before I
8 even get to the headlines, let's call them, the first
9 thing I'm gonna see is an ad for - just to give you
10 an example, Super Female Vitality, right?

11 MS. PAZ: Sure, it's prob - it's very, very
12 prominent on the very first page of the website.

13 ATTY. MATTEI: Not only is this prominent, you
14 can't even see the first page of the website until
15 you click through that ad, right?

16 MS. PAZ: Um, I'm not sure if you have to click
17 thorough it. I haven't been on the website in a long
18 - in a while.

19 ATTY. MATTEI: That's okay.

20 Why don't we pull up Exhibit 84, I think - it's
21 already in, Judge, as full. Uh, that's not what I
22 meant, I'm sorry.

23 Let's pull up Exhibit 85.

24 THE COURT: Is that full, Ron?

25 THE CLERK: Yes, Your Honor.

26 ATTY. MATTEI: This isn't it.

27 PARALEGAL: 86.

1 ATTY. MATTEI: Thank you, 86, here we go, thank
2 you.

3 All right, this is what I was talking about. So,
4 this is what I was referring to. When you come to
5 Infowars.com, this is the first thing you see, right?

6 MS. PAZ: Yeah, it's a pop-up ad, yes.

7 ATTY. MATTEI: It's a pop-up ad.

8 MS. PAZ: Right, you don't have to click on the
9 ad, you can X it out.

10 ATTY. MATTEI: Right, you click the X up in the
11 upper right button, and if you do that you get to the
12 news, right?

13 MS. PAZ: Correct.

14 ATTY. MATTEI: If you click on DNA Force Plus, 50
15 percent off . . .

16 MS. PAZ: It'll bring you to the store.

17 ATTY. MATTEI: It'll bring you to the store.

18 MS. PAZ: Correct.

19 ATTY. MATTEI: Got it.

20 And that's how he makes his money, yeah?

21 MS. PAZ: Oh yes, most of it.

22 ATTY. MATTEI: So, Your Honor, if I - I'm just
23 gonna get a little water, is that okay?

24 THE COURT: Certainly.

25 ATTY. MATTEI: Thanks.

26 THE COURT: There should be fresh water in that
27 pitcher, if you need to drink it.

1 MS. PAZ: Oh, oh I'm gonna go there next, thank
2 you, Your Honor. Saw me getting low.

3 ATTY. MATTEI: All right.

4 So, we talked a little about - I just mentioned
5 the audience, I want to talk about that. The - since
6 the Sandy Hook shooting, Mr. Jones's audience has
7 grown exponentially, is that fair to say?

8 MS. PAZ: Since 2012, yes. So, there has been an
9 increase in the viewership.

10 ATTY. MATTEI: It's been at least - as Mr. Jones
11 has described it, it's been an exponential growth,
12 correct?

13 MS. PAZ: I think he's used those words, yes.

14 ATTY. MATTEI: All right, and as result of that
15 growth, Alex Jones and Infowars have had billions
16 upon billions of social media impressions, correct?

17 MS. PAZ: I'm sure that there have been that
18 many, I don't know the exact number, but I'm not
19 gonna disagree with you that there's a big social
20 media footprint.

21 ATTY. MATTEI: And I talked about this in my
22 opening, but I want to . . .

23 ATTY. PATTIS: Object - objection, Judge, it's
24 not evidence.

25 THE COURT: Sustained.

26 ATTY. MATTEI: No, no, I was just premising
27 because now we're gonna show him the evidence.

1 So, why don't we pull up Exhibit 220; and this
2 is in, Judge.

3 THE CLERK: Yes, it is. Your Honor.

4 ATTY. MATTEI: That one, right? Okay.

5 Now, you've reviewed this document before,
6 right?

7 MS. PAZ: Yes, I think I've seen this before,
8 yes.

9 ATTY. MATTEI: So, one of the things that we
10 asked Infowars to give us, were all of their social
11 media numbers beginning in 2012, right?

12 MS. PAZ: Yes.

13 ATTY. MATTEI: Now, they didn't give us all of
14 their numbers, did they?

15 MS. PAZ: Um, I'm not sure what was produced, to
16 be honest, and I know that there have been issues
17 with locating material . . .

18 ATTY. MATTEI: Okay.

19 MS. PAZ: . . . and finding out who has access to
20 certain material and things like that, so.

21 ATTY. MATTEI: Well, this gets back to what I was
22 asking you about earlier. You acknowledge that you
23 have an independent duty to - did you not, to
24 determine things like Alex Jones's audience size,
25 correct?

26 MS. PAZ: And I did make attempts to do that,
27 yes.

1 ATTY. MATTEI: Okay, and you - because you knew
2 we had asked for all of their social media audience
3 numbers - you asked them to give it to you, correct?

4 MS. PAZ: Yes, I asked for a lot information
5 regarding social media and audience size and
6 financials - I asked for a lot of material, yes.

7 ATTY. MATTEI: Right and Alex Jones did give you
8 any social media numbers for 2012, did he?

9 MS. PAZ: So, I don't think that there's - and
10 no, I didn't receive anything to that affect . . .

11 ATTY. MATTEI: Okay, thank you.

12 MS. PAZ: . . . and there's a problem as to why
13 that is.

14 ATTY. MATTEI: Well, there's a problem as to why
15 that is? You agree with me, that Alex Jones was under
16 a legal obligation to produce that type of data for
17 the years that we asked, correct?

18 MS. PAZ: I understand that he is under the
19 obligation to produce.

20 ATTY. MATTEI: Okay, and you asked for it,
21 correct?

22 MS. PAZ: I asked for a lot of things, yes.

23 ATTY. MATTEI: Okay, and in 2012 - you weren't
24 given any social media data for 2012, correct?

25 MS. PAZ: I did not see any data for 2012, no.

26 ATTY. MATTEI: Because you weren't given it.

27 MS. PAZ: I was not given it.

1 ATTY. MATTEI: Okay, you weren't given any for
2 2013, right?

3 MS. PAZ: No.

4 ATTY. MATTEI: Okay, and you personally weren't
5 given any - any social media audience figures,
6 correct?

7 MS. PAZ: I don't believe so, no.

8 ATTY. MATTEI: All right, but we have this, and
9 so let's take a look at this.

10 This is 2015, and you understand this - let's
11 just focus in the title there. You understand this to
12 be a group report for the year 2015, for all Alex
13 Jones's social media accounts on Facebook, Twitter,
14 Instagram, and LinkedIn, right?

15 MS. PAZ: That's what it appears, yes.

16 ATTY. MATTEI: All right, let's go to page 2, and
17 we're just gonna advance through this. These are the
18 accounts that it covers, correct?

19 MS. PAZ: Yes.

20 ATTY. MATTEI: All right, let's go to the next
21 page. Okay, and let's just pull up the top portion
22 there.

23 All right, so this is for 2015, right? Alex
24 Jones's and Infowars social media engagement numbers
25 for the accounts that we saw, right?

26 MS. PAZ: Right, for those particular accounts.

27 ATTY. MATTEI: So, in 2015 alone, there were 2.9

1 billion impressions, right?

2 MS. PAZ: That's what it says, yes.

3 ATTY. MATTEI: That means that, on social media,
4 his stuff was viewed 2.9 billion times?

5 MS. PAZ: Uh, viewed - right. Impressions and
6 then the engagements are different.

7 ATTY. MATTEI: We're gonna go to that.

8 MS. PAZ: But yes, viewed.

9 ATTY. MATTEI: Right, viewed.

10 MS. PAZ: Yes.

11 ATTY. MATTEI: Right, 28.8 million engagements,
12 right?

13 MS. PAZ: Engagements, yes.

14 ATTY. MATTEI: And what that means is, they liked
15 it, right?

16 MS. PAZ: Liked it, commented on it, re-tweeted
17 it.

18 ATTY. MATTEI: Shared it.

19 MS. PAZ: Shared it, right.

20 ATTY. MATTEI: And then there were 24 million
21 link clicks. So, if somebody sees, in 2015 - let's
22 say for example, um, you're aware that in 2015 Alex
23 Jones was repeatedly airing Wolfgang Halbig's trips
24 to Connecticut, right?

25 MS. PAZ: He did a few times, yes.

26 ATTY. MATTEI: He had him on the air, right?

27 MS. PAZ: Yes.

1 ATTY. MATTEI: He had Dan Bidondi up here with
2 him?

3 MS. PAZ: Yes.

4 ATTY. MATTEI: Okay, and if somebody saw that on
5 social media, that would be the type of link click
6 we're talking about here - they clicked on it, right?

7 MS. PAZ: Right, so if a link to Halbig's
8 interview in one of those social media posts and a
9 link to the article or a link to the video, and they
10 clicked on that link.

11 Correct, that's what that means.

12 ATTY. MATTEI: Okay, and that's just for 2015?

13 MS. PAZ: Yes.

14 ATTY. MATTEI: All right.

15 Let's go to Exhibit 228, I believe this is in as
16 well.

17 THE CLERK: Yes, it is, Your Honor.

18 ATTY. PATTIS: What's the number on that, sir?

19 THE CLERK: 228.

20 THE COURT: 228.

21 ATTY. PATTIS: Thank you.

22 ATTY. MATTEI: Um, yeah. Actually, you know what,
23 I'm gonna ask a few more questions about that last
24 exhibit, so let's just take that down for a second.

25 And Free Speech Systems actually made social
26 media engagement and audience growth a central pillar
27 of its growth strategy from 2012 on, correct?

1 MS. PAZ: I'm sorry, I don't understand the
2 question, can you repeat it?

3 ATTY. MATTEI: Okay, sure.

4 Let's take it even back a little further than
5 that. You'd agree with me, that very, very early on,
6 Alex Jones realized the power of social media to
7 spread his content, right?

8 MS. PAZ: Sure, that's why he has all those
9 various accounts.

10 ATTY. MATTEI: Well, that's 2015, but he was on
11 social media 2009/2010, wasn't he?

12 MS. PAZ: Yeah.

13 ATTY. MATTEI: Right, and that's just when it was
14 really kind of coming on, correct?

15 MS. PAZ: I had a Facebook in 2005 so, I don't
16 know, I guess . . .

17 ATTY. MATTEI: You were a pioneer.

18 ATTY. MATTEI: I had one in 2005.

19 ATTY. MATTEI: And Alex Jones had built a pretty
20 significant social media audience in the early
21 2000's, fair to say?

22 MS. PAZ: Sure.

23 ATTY. MATTEI: Okay, and a central strategy of
24 Free Speech Systems growth was to engage audience on
25 social media, correct?

26 MS. PAZ: Sure.

27 ATTY. MATTEI: And the way that they did that

1 was, every time Alex Jones would film the 'Alex Jones
2 Show, the show would be chopped up into clips, right?

3 MS. PAZ: Yes.

4 ATTY. MATTEI: Okay, and Alex Jones would
5 personally title every clip, right?

6 MS. PAZ: Um, I don't know if he personally
7 titled all the clips. I think producers did have a
8 hand in it, as well. But I don't know if he
9 personally titled every single clip from 2-3-hour
10 segments.

11 So, I don't know that he had a personal hand in
12 each and every one. I know that he has titled clips.

13 ATTY. MATTEI: Well, so, I'm just asking, is Free
14 Speech Systems testimony that it doesn't know whether
15 it was Alex Jones's practice to title every clip?

16 MS. PAZ: I don't - I don't recall, as I sit here
17 today, whether he titled every single clip. I know he
18 has done it.

19 ATTY. MATTEI: I'm sorry, you do recall Nico
20 Acosta's (phonetic) testimony on this subject,
21 correct?

22 MS. PAZ: He has been deposed, yes.

23 ATTY. MATTEI: Nico Acosta (phonetic) was Alex
24 Jones's long-time producer of the 'Alex Jones Show',
25 correct?

26 MS. PAZ: Yes.

27 ATTY. MATTEI: Okay, and he testified that it

1 was, in fact, Alex Jones's practice to title every
2 single clip from the 'Alex Jones Show', correct?

3 MS. PAZ: I don't recall, I'm sorry.

4 ATTY. MATTEI: All right, well, the Jury will see
5 that.

6 MS. PAZ: Sure.

7 ATTY. MATTEI: In any event, every single clip
8 was uploaded to Facebook, correct?

9 MS. PAZ: Every single clip - I know a lot of
10 clips were uploaded to Facebook, I don't know if
11 every clip was always uploaded to Facebook, I don't
12 recall.

13 ATTY. MATTEI: Let's do it this way . . .

14 MS. PAZ: Sure.

15 ATTY. MATTEI: . . . the practice at Infowars was
16 to upload every single clip that Alex Jones would
17 play from his show to Facebook, right?

18 MS. PAZ: I don't recall whether it's every
19 single clip; I know a lot of clips have been
20 uploaded.

21 ATTY. MATTEI: But I asked you if that was the
22 practice, wasn't it?

23 MS. PAZ: To upload clips to Facebook, yes.

24 ATTY. MATTEI: Yeah, and it was the practice to
25 upload clips from the 'Alex Jones Show' to Twitter,
26 correct?

27 MS. PAZ: Yes.

1 ATTY. MATTEI: It was the practice to upload them
2 to YouTube, right?

3 MS. PAZ: Yes.

4 ATTY. MATTEI: It was a practice to upload them
5 to every online platform he had, correct?

6 MS. PAZ: Yes.

7 ATTY. MATTEI: If you go to Banned.Video right
8 now, you can see the full broadcast of the 'Alex
9 Jones Show', correct?

10 MS. PAZ: Yes.

11 ATTY. MATTEI: And you can see every clip he made
12 of it, correct?

13 MS. PAZ: I believe so, yes.

14 ATTY. MATTEI: Okay, and the reason that he did
15 that, is because Alex Jones knew that video is the
16 most engaged medium online, correct?

17 MS. PAZ: I don't know how to answer that, I
18 don't know what he knows about the videos. I know
19 that that's what he does, I can't say what he knows.

20 ATTY. MATTEI: Okay, well aren't you responsible
21 for knowing what he knows? Isn't that your - your
22 duty?

23 MS. PAZ: My responsibility here was to figure
24 out what Free Speech Systems knew at the time.

25 ATTY. MATTEI: Right.

26 MS. PAZ: So, I wasn't in Alex Jones's head, so I
27 can't say what he thought about videos.

1 ATTY. MATTEI: Did you ask him about his strategy
2 for increasing his audience online?

3 MS. PAZ: I don't recall us specifically talking
4 about that. I did have a couple of conversations with
5 him prior to my depositions in Texas, but I don't
6 recall us specifically talking about that.

7 ATTY. MATTEI: Free Speech Systems is aware that
8 video, as a medium, is the most engaging medium
9 online to grow audience, correct?

10 MS. PAZ: I don't know.

11 ATTY. MATTEI: People are most likely to click on
12 it, correct?

13 MS. PAZ: I - I don't know.

14 ATTY. MATTEI: And Free Speech Systems knows that
15 titling videos in a way that is designed to get
16 attention, is another way to get its audience to
17 engage with it, correct?

18 MS. PAZ: Oh, sure.

19 ATTY. MATTEI: Daria Karpova, Mr. Jones's long-
20 time producer testified about this, correct?

21 MS. PAZ: Yes, I do recall that testimony.

22 ATTY. MATTEI: She talked about click-bait,
23 right?

24 MS. PAZ: Yes, she did.

25 ATTY. MATTEI: Click-bait. Click-bait is the way
26 that you title a video to provoke a response in the
27 person seeing it, correct?

1 MS. PAZ: Yes, I believe that was her testimony.

2 ATTY. MATTEI: Okay, so like, for example, a
3 headline like, '*Connecticut School Massacre Looks*
4 *Like False Flag, Witnesses Say*', that's click-bait,
5 right?

6 MS. PAZ: Um, it's click-bait in sense that it
7 would grab somebody's attention, yes.

8 ATTY. MATTEI: And it's click-bait in the fact
9 that it wasn't true, correct?

10 MS. PAZ: What - I'm sorry, repeat the question?
11 Which wasn't true - that title?

12 ATTY. MATTEI: Correct.

13 MS. PAZ: That witnesses say - can you repeat the
14 title?

15 ATTY. MATTEI: Yeah, '*Connecticut School Massacre*
16 *Looks Like False Flag, Witnesses Say*'.

17 One of the reasons it was click-bait is because
18 it's attention grabbing, the other reason is because
19 it's false, correct?

20 MS. PAZ: Is the reason why it was titled that
21 way, and it's click-bait because it's false - I don't
22 know how to answer that question.

23 ATTY. MATTEI: Let me break it down. Free Speech
24 Systems acknowledges that that headline is false,
25 correct?

26 MS. PAZ: I don't think that we disagree with -
27 that there were false statements made in connection

1 with the Sandy Hook litigation - or not litigation,
2 I'm sorry, I connection with Sandy Hook.

3 ATTY. MATTEI: Right, and one of the things that
4 Free Speech Systems doesn't disagree with, that it
5 acknowledges, is that the title of the video,
6 '*Connecticut School Massacre Looks Like False Flag,*
7 *Witnesses Say*', is false.

8 MS. PAZ: I don't disagree with that, no.

9 ATTY. MATTEI: Free Speech Systems doesn't
10 disagree?

11 MS. PAZ: Correct.

12 ATTY. MATTEI: Because in that video, there
13 wasn't a single witness who said it - that it looked
14 like a false flag, correct?

15 MS. PAZ: The video that, for that particular um,
16 clip that you're referencing?

17 ATTY. MATTEI: Right.

18 MS. PAZ: I don't recall this specific clip;
19 would you like us to look at it?

20 ATTY. MATTEI: We're definitely going to show
21 you.

22 MS. PAZ: Yeah, I don't recall this specific
23 clip, as I said here.

24 ATTY. MATTEI: Okay, but - and one of the reasons
25 you don't recall it - this goes back to your
26 preparation, the only way that you were able to
27 become informed, let's say, about Infowars, was based

1 on information that Alex Jones provided to you,
2 correct?

3 MS. PAZ: Well, Alex didn't provide it to me
4 specifically, I received it from the attorneys.

5 ATTY. MATTEI: Okay.

6 MS. PAZ: So, I didn't - Alex didn't give me
7 copies of material, I received it from counsel to
8 review.

9 ATTY. MATTEI: Okay, so, which lawyer sent you
10 material?

11 MS. PAZ: So, the material that I reviewed was in
12 a Drop Box; that Drop Box was shared with me by, I
13 believe our Free Speech Systems attorney at the time
14 was Attorney Blot (phonetic). So, I was shared the
15 material in the Drop Box from her.

16 ATTY. MATTEI: Okay, Attorney Blot (phonetic).

17 Attorney Blot (phonetic) represented Alex Jones
18 and Free Speech Systems . . .

19 MS. PAZ: In Texas.

20 ATTY. MATTEI: In Texas.

21 MS. PAZ: Correct.

22 ATTY. MATTEI: Correct, he's had - he has a
23 number of lawyers, correct?

24 MS. PAZ: Quite a few.

25 ATTY. MATTEI: Right, and Andino Reynal is one of
26 his lawyers, right?

27 MS. PAZ: Most recently, yes.

1 ATTY. MATTEI: Okay, have you talked to him?

2 MS. PAZ: No.

3 ATTY. MATTEI: Okay, Marc Randazza is one of his
4 lawyers, correct?

5 MS. PAZ: Yes.

6 ATTY. MATTEI: And you met with him, right?

7 MS. PAZ: Uh, no, I don't believe I met with
8 Marc.

9 ATTY. MATTEI: Oh, I saw something in your time
10 records that you had a meeting with Marc and Zach -
11 who's that?

12 MS. PAZ: Zach, as in Attorney Reiland - he's
13 sitting right there.

14 ATTY. MATTEI: I know Zach, who's the Marc?

15 MS. PAZ: And Marc Schwartz.

16 ATTY. MATTEI: Okay, Marc Schwartz, all right.

17 You - Alex Jones has been represented by um,
18 Brad Reeves.

19 MS. PAZ: Yes.

20 ATTY. MATTEI: All right, and Attorney Pattis, as
21 well.

22 MS. PAZ: Yes.

23 ATTY. MATTEI: But it was Ms. Blot (phonetic) who
24 sent you the material?

25 MS. PAZ: Yes, she had access to the Drop Box.

26 ATTY. MATTEI: And it would of only been Alex
27 Jones who had the authority to decide what to send

1 you, correct?

2 MS. PAZ: No.

3 ATTY. PATTIS: Objection, calls for speculation,
4 Judge.

5 THE COURT: Overruled.

6 MS. PAZ: No, I was provided with everything that
7 they had in their production. So, I don't think
8 anything was withheld from me - if that was your
9 question.

10 ATTY. MATTEI: That is what I'm getting at,
11 because the video, '*Connecticut School Massacre Looks Like
12 False Flag*' was not provided to you, was it?

13 MS. PAZ: I don't - I don't recall.

14 ATTY. MATTEI: All right, let's um . . .

15 MS. PAZ: I had a handy dandy note - if you
16 recall, I had 100 pages of notes on the videos that I
17 watched, and I don't have that in front of me. So, I
18 just don't recall, as I said, which videos I watched.

19 ATTY. MATTEI: Okay, and I'm gonna show you that
20 testimony.

21 MS. PAZ: Sure.

22 ATTY. MATTEI: But let me ask you this, it would
23 of been very relevant to you to have seen the first
24 things that Alex Jones said about the Sandy Hook
25 shooting, correct?

26 MS. PAZ: Of course.

27 ATTY. MATTEI: And the first things he said about

1 the Sandy Hook shooting are on that video,
2 *'Connecticut School Massacre Looks Like False Flag,*
3 *Witnesses Say'*, correct?

4 MS. PAZ: I don't know what video we're talking
5 about, just because I don't have my notes.

6 ATTY. MATTEI: All right.

7 MS. PAZ: So, I don't recall.

8 ATTY. MATTEI: Your Honor, may I have just one
9 moment?

10 THE COURT: Take your time.

11 MS. PAZ: Thank you.

12 ATTY. PATTIS: (indiscernible) caffeine pill.

13 MS. PAZ: I am moving on to the water.

14 THE COURT: (indiscernible) during the break.

15 MS. PAZ: Is it? Thanks.

16 THE COURT: (indiscernible).

17 ATTY. MATTEI: Okay, all right.

18 Can we just bring up, um - just for witness
19 please, Exhibit 10 from the deposition; this has been
20 marked for I.D., Your Honor, and I'll figure it out
21 while you . . .

22 ATTY. PATTIS: Is it on the list, sir?

23 ATTY. MATTEI: Which - yes, it is, I'll get you
24 the paper.

25 So, Ms. Paz, as you sit here today, you don't
26 know at the moment, whether you were provided with
27 the very first video that Alex Jones aired on -

1 Oh, we can take that down, I just want it for
2 the witness.

3 You recall at your deposition, there was a
4 stipulation about videos?

5 MS. PAZ: A stipul - oh, yes, there was, yes.

6 ATTY. MATTEI: I would re-pull up 245 just for
7 you, okay? Can you see it?

8 MS. PAZ: Sure, uh, not yet. There's nothing
9 there yet.

10 Yes, I see it.

11 ATTY. MATTEI: Can we do it just for the
12 witness's screen, please? Not for every screen, do we
13 know how to do that?

14 Okay, go down to Exhibit A, please, to this
15 deposition.

16 Do you still have it?

17 MS. PAZ: Yes, I do but it's . . .

18 ATTY. MATTEI: All right can you just hold on to
19 Exhibit A?

20 MS. PAZ: Um-hmm.

21 ATTY. MATTEI: Exhibit A, you will recall Ms.
22 Paz, is a list of videos that you were provided,
23 right?

24 MS. PAZ: Uh, yes, yes.

25 ATTY. MATTEI: And the video, '*Connecticut School*
26 *Massacre Looks Like False Flag, Witnesses Say*' was
27 not provided to you, correct?

1 MS. PAZ: It's not on this list, no.

2 ATTY. MATTEI: All right. Now, I've been told I'm
3 wandering a little bit, so I'm trying to get back on
4 track.

5 MS. PAZ: It happens.

6 ATTY. MATTEI: Have you look at that video
7 though? That chart, there?

8 MS. PAZ: This list, um-hmm.

9 ATTY. PATTIS: And we're doing this because . . .

10 ATTY. MATTEI: That reminds you that the title of
11 that video was '*Connecticut School Massacre Looks*
12 *Like False Flag, Witnesses Say*'?

13 MS. PAZ: Well, as you said, it wasn't on the
14 list of videos that I reviewed, so.

15 ATTY. MATTEI: Right, but we talked about it at
16 your deposition.

17 MS. PAZ: We did, yes.

18 ATTY. PATTIS: Good lawyer, but man, beat that
19 hobbyhorse to death.

20 ATTY. MATTEI: Yeah, okay, and Free Speech
21 Systems acknowledges that in that video, not a single
22 witness said that Sandy Hook was false flag, correct?

23 MS. PAZ: I don't believe so.

24 ATTY. MATTEI: You mean, yes, you acknowledge it?

25 MS. PAZ: Right, right, correct.

26 ATTY. MATTEI: All right. So, let's go to that
27 exhibit I was trying to pull up earlier, this is 228,

1 this is going back to our discussion about his
2 audience, okay?

3 MS. PAZ: Okay.

4 ATTY. MATTEI: And the reason we got on that
5 video is because I was - I'm reminding myself now,
6 that the reason we got on that video is because I was
7 talking to you about the different ways that Alex
8 Jones tries to engage his audience, right? And that's
9 how we got on click-bait, right?

10 MS. PAZ: Um-hmm.

11 ATTY. MATTEI: But what I really want to talk to
12 you about is the audience, and so this Exhibit 228 -
13 you're familiar with Google Analytics? Like, the
14 term?

15 MS. PAZ: Yes, and I've seen this Exhibit before.

16 ATTY. MATTEI: Great, this is a program that
17 Infowars uses to track its web performance, right?

18 MS. PAZ: Well, I know that there's an issue as
19 to whether we actively use this, but it is available
20 to Free Speech to track this type of information, as
21 far as internet traffic.

22 ATTY. MATTEI: Let's just pull it down for a
23 second.

24 So, I'm not asking that. You're Free Speech
25 Systems.

26 MS. PAZ: Yes.

27 ATTY. MATTEI: We're about to look at an Exhibit,

1 from Infowars, showing Google Analytics data, correct?

2 MS. PAZ: Yes.

3 ATTY. MATTEI: Okay, does Free Speech Systems use
4 Google Analytics to track its website performance?

5 MS. PAZ: So, we talked about this a lot in our
6 depositions, as far as whether . . .

7 ATTY. MATTEI: Wait, hang on a second Ms. Paz,
8 hold on a second.

9 MS. PAZ: Yes.

10 ATTY. MATTEI: I don't want to know what we
11 talked about in our depositions . . .

12 MS. PAZ: Sure.

13 ATTY. MATTEI: I just want to know yes or no, as
14 Free Speech Systems, sitting here right now, does it
15 use Google Analytics to track its website
16 performance?

17 MS. PAZ: It is available according to my
18 investigation. It does not actively use this
19 information.

20 THE COURT: Is that a yes or a no?

21 MS. PAZ: No.

22 ATTY. PATTIS: Now I'm confused, Judge. I don't
23 mean rude, is it 'no' to you or 'no' to the question?

24 THE COURT: I assume it was 'no' to the question.

25 MS. PAZ: That's what I - that, I'm sorry. It was
26 'no' to the question.

27 ATTY. PATTIS: Okay, I didn't understand the

1 question.

2 MS. PAZ: Sorry.

3 ATTY. MATTEI: So, Free Speech Systems testimony
4 here today, is that it does not use Google Analytics
5 to track its website performance, correct?

6 MS. PAZ: Correct, that's based on my various
7 investigation and discussion with the employees and
8 my review of the material.

9 ATTY. MATTEI: We'll pull up Exhibit 120,
10 please.

11 THE CLERK: That is a full exhibit, Your Honor.

12 ATTY. MATTEI: All right, now this is an email
13 from Chris Andrews, right?

14 MS. PAZ: Yes.

15 ATTY. MATTEI: Infowars employee, correct?

16 MS. PAZ: Yes.

17 ATTY. MATTEI: Sent June 20, 2014, right?

18 MS. PAZ: Yes.

19 ATTY. MATTEI: To Tim Fruge, right?

20 MS. PAZ: Yes.

21 ATTY. MATTEI: Tim Fruge is Mr. Jones's long-time
22 director of his online business, right? He basically
23 runs the online store.

24 MS. PAZ: Um, I mean, I don't know if I'd say
25 'long-time', but he's come and gone quite a few
26 times; but he, at that time, was, yes.

27 ATTY. MATTEI: He's only come and gone once,

1 right? Like, he was hired back in 2009, right?

2 MS. PAZ: He was hired back and then he left
3 again.

4 ATTY. MATTEI: Right, but just stick with me now.
5 He was hired in 2009 . . .

6 MS. PAZ: Right.

7 ATTY. MATTEI: He worked for Infowars all the way
8 through 2019, right?

9 MS. PAZ: I don't know the exact date, but yes,
10 he left in 2019; he came back briefly in 2021, I
11 wanna say.

12 ATTY. MATTEI: All right.

13 MS. PAZ: Correct.

14 ATTY. MATTEI: Because he was deposed in this
15 case in 2019?

16 MS. PAZ: Yes, he was.

17 ATTY. MATTEI: All right, in any event - so he is
18 being sent this email by Chris Andrews, right?

19 MS. PAZ: That's what it says, yes.

20 ATTY. MATTEI: 'This is all four of our websites
21 from Google Analytics', 'These are the updated
22 versions of the others, also', right?

23 MS. PAZ: That's what it says, yes.

24 ATTY. MATTEI: And attached are four Excel
25 spreadsheets for different websites owned by Free
26 Speech Systems, right?

27 MS. PAZ: That's what it says, yes.

1 ATTY. MATTEI: One is InfowarsShop.com . . .

2 MS. PAZ: Yes.

3 ATTY. MATTEI: At the time, that was r. Jones's
4 online store, right?

5 MS. PAZ: Yes.

6 ATTY. MATTEI: Okay, he then added
7 InfowarsStore.com, a couple years later, right?

8 MS. PAZ: Yes.

9 ATTY. MATTEI: All right, there's another one for
10 Infowars.com, that's the website, right?

11 MS. PAZ: Yes.

12 ATTY. MATTEI: Okay, PrisonPlanet.com, that's
13 another website, right?

14 MS. PAZ: Right.

15 ATTY. MATTEI: And what Mr. Andrews is doing, is
16 sending Alex Jones's business director all of the
17 numbers for those websites, of how those websites
18 were performing, correct?

19 MS. PAZ: On this particular date, yes.

20 ATTY. MATTEI: Right, and if we scroll down -
21 let's scroll down to Infowars.com for 2011, talked
22 about this in opening.

23 Could we put up both pages, would you mind? Oh
24 great, yeah.

25 So, the Jury saw these numbers in opening, this
26 is basically Infowars.com's website performance for
27 the whole year, right?

1 MS. PAZ: That's what it is, yes.

2 ATTY. MATTEI: 280 million page views . . .

3 MS. PAZ: Correct.

4 ATTY. MATTEI: . . . being sent to the business
5 director.

6 MS. PAZ: Well, I don't know if that was his
7 title at the time, but it was emailed to him, yes.

8 ATTY. MATTEI: Do you want to revise your
9 testimony about whether - that you just gave to the
10 Judge, that Infowars doesn't use Google Analytics?

11 MS. PAZ: No, and if I could expound on that I
12 would be happy to.

13 ATTY. MATTEI: Um, well, before you expound on
14 it, why don't you tell me who gave you the
15 information that Infowars doesn't use Google
16 Analytics?

17 MS. PAZ: So, I did review, obviously, the
18 various depositions, but I also spoke to Blake Roddy,
19 who is currently employed there, and I did review
20 with him - there's a couple of emails to that affect,
21 about requests to pull Google Analytics.

22 Whether it's done with any regularity, or
23 whether it is used actively in the marketing strategy
24 by Free Speech Systems - as far as me, trying to
25 familiarize myself with the marketing and what
26 information is used, because that was a topic.

27 ATTY. MATTEI: Can I just stop you there for a

1 second?

2 Ms. Paz: Sure.

3 ATTY. MATTEI: Because I think what I asked you
4 is who told you that they didn't use it? Did Blake
5 Roddy tell you that?

6 MS. PAZ: Yes.

7 ATTY. MATTEI: Okay. Blake Roddy told you that
8 they didn't use it?

9 MS. PAZ: His position to me was that, they only
10 usually pulled it or would pull it at the request for
11 litigation purposes, and sporadically at the request
12 of various people - but it wasn't actively used in
13 the marketing strategy.

14 ATTY. MATTEI: Let's go to 2012.

15 ATTY. PATTIS: I can't see the number of the
16 exhibit.

17 Number, please?

18 ATTY. MATTEI: Same Exhibit.

19 ATTY. PATTIS: Thank you.

20 ATTY. MATTEI: Year of 2012, right, and we went
21 through this in opening yesterday, as well.

22 You see the total numbers for 2012, right?

23 MS. PAZ: Yes, I do see it, yes.

24 ATTY. MATTEI: Okay, 286 million page views,
25 right?

26 MS. PAZ: That's what it says, yes.

27 ATTY. MATTEI: Okay, and then you see the numbers

1 for December, 10.6 million sessions, 4.6 million
2 users, 24.9 million page views, right?

3 MS. PAZ: That's what it says, yes.

4 ATTY. MATTEI: Okay, you've reviewed this Exhibit
5 before?

6 MS. PAZ: Um, can you zoom out on it?

7 ATTY. MATTEI: This is the email that we've been
8 looking at.

9 MS. PAZ: I'm sorry, can you just go to the first
10 page?

11 ATTY. MATTEI: Sure.

12 MS. PAZ: No, that's not the first page.

13 ATTY. MATTEI: This is the email that we just
14 pulled up, and this is the first page of the Exhibit.

15 MS. PAZ: No, I mean the first page of the Google
16 Analytics. I reviewed the files that had - that
17 looked like they had the charts on them. So, I don't
18 recall whether I saw this specifically, but I have
19 reviewed various Google Analytics documents, so I
20 have seen them.

21 ATTY. MATTEI: Do you know whether they gave this
22 to you?

23 MS. PAZ: I'm sorry?

24 ATTY. MATTEI: Do you know whether they gave this
25 to you?

26 Ms. Paz: I don't recall. I do recall seeing
27 various Google Analytics documents, so I don't recall

1 this particular document.

2 ATTY. MATTEI: And the reason why I'm asking if
3 they gave you this one is - let's go back to 2012 for
4 Infowars.com, and let's - pull up 2012 and 2013.

5 The reason I'm asking you whether they gave you
6 this one is because, if you look between December
7 2012 and January 2013 - you know the Sandy Hook
8 shooting happened on December 14th, 2012, right?

9 MS. PAZ: yes, I know the date.

10 ATTY. MATTEI: Remember, Free Speech Systems
11 acknowledges now, in this courtroom, that 26 people
12 were murdered at Sandy Hook, correct?

13 MS. PAZ: Yes.

14 ATTY. MATTEI: And they acknowledge that Adam
15 Lanza is the person who went into the school that day
16 - and the only person, correct? And committed that
17 atrocity, correct?

18 MS. PAZ: Yes.

19 ATTY. MATTEI: Okay Free Speech Systems now is
20 saying that to this Jury, right?

21 MS. PAZ: Yes.

22 ATTY. MATTEI: If you look at December, you had
23 10.6 million sessions, it goes up to 14.6 in January,
24 doesn't it?

25 MS. PAZ: That's what it appears, yes.

26 ATTY. MATTEI: It appears, or it is?

27 MS. PAZ: That's what the document says, yes.

1 ATTY. MATTEI: This is your document, right?

2 MS. PAZ: Free Speech Systems produced this, yes.

3 ATTY. MATTEI: Okay. It goes from 49 million
4 users - oh this one. I'm sorry.

5 MS. PAZ: No, that's the year, total.

6 ATTY. MATTEI: I'm sorry, 4.6 million users to
7 6.3 million users, correct?

8 MS. PAZ: That's what it says, yes.

9 ATTY. MATTEI: It goes from 24.9 million page
10 views to 35.7 million page views, right?

11 MS. PAZ: That's what it says, yes.

12 ATTY. MATTEI: And you know, that from December
13 14, 2012, all the way through the end of January,
14 Alex Jones and Free Speech Systems were repeatedly
15 publishing claims that the shooting was staged,
16 correct?

17 MS. PAZ: I believe so, yes.

18 ATTY. MATTEI: And you know, from Timothy Fruge's
19 deposition, the business director, that Alex Jones
20 asks him for sales numbers every day, right?

21 MS. PAZ: Uh, yes, he does ask him for numbers
22 regarding how much is in stock, if there's an
23 overstock of particular items . . .

24 ATTY. MATTEI: I didn't ask overstock, I just
25 said sales. He asked about sales every day, right?

26 MS. PAZ: Okay, right he does get sales numbers,
27 yes. Right.

1 ATTY. MATTEI: And you heard Timothy Fruge's
2 deposition, that Alex Jones knows what he's talking
3 about on the air. When he has a good sales day,
4 right?

5 MS. PAZ: I'm sorry, can you repeat the question?

6 ATTY. MATTEI: Alex Jones knows what he's talking
7 about on the air, when he has a good sales day,
8 right?

9 MS. PAZ: You mean - you mean if he has a good
10 sales day, it's related to what he's talking about on
11 the air? Is that your question? I just want to make
12 sure I understand your question.

13 ATTY. MATTEI: My question is you recall Timothy
14 Fruge's deposition, correct?

15 MS. PAZ: I know he testified, yes, and I
16 reviewed it

17 ATTY. MATTEI: And he testified that Alex Jones
18 knows what he's talking about when he has a good
19 sales day, correct?

20 MS. PAZ: He knows what he's talking about
21 translates into sales, yes.

22 ATTY. MATTEI: And you remember David Jones's
23 deposition - David Jones, I know you said you don't
24 know whether he's ever employed, right?

25 MS. PAZ: Right, I don't recall the deposition
26 testimony.

27 ATTY. MATTEI: You don't?

1 MS. PAZ: I don't recall Dr. Jones's deposition
2 testimony regarding the employment.

3 ATTY. MATTEI: Okay, right, right, I'm sorry.

4 MS. PAZ: Right, right.

5 ATTY. MATTEI: (indiscernible)

6 You recall David Jones's testimony, that when
7 Alex Jones has a good sales day, they try and
8 replicate what he was talking about, so they can
9 replicate those sales.

10 MS. PAZ: I do recall that testimony, yes.

11 ATTY. MATTEI: Thank you.

12 Your Honor, I'm sorry can you remind me when our
13 morning break is?

14 THE COURT: Could have it at any time between now
15 and the next 10 minutes; is this a good time?

16 ATTY. MATTEI: This is a great time.

17 THE COURT: All right, so we will take our
18 morning recess at this point.

19 You'll remember all the rules all the rules of
20 Juror conduct that I told you about. Ron will collect
21 your notebooks and we will see you in 15 minutes,
22 we'll take a recess.

23 THE MARSHAL: All rise, please.

24 (JURY EXITS COURTROOM)

25 (MORNING RECESS)

26

DKT NO: X06-UWY-CV186046436-S	:	COMPLEX LITIGATION DKT
ERICA V. LAFFERTY	:	JUDICIAL DISTRICT WATERBURY
v.	:	AT WATERBURY, CONNECTICUT
ALEX EMRIC JONES	:	SEPTEMBER 14, 2022

DOCKET NO: X06-UWY-CV186046437-S

WILLIAM SHERLACH

v.

ALEX EMRIC JONES

DOCKET NO: X06-UWY-CV186046438-S

WILLIAM SHERLACH

v.

ALEX EMERIC JONES

C E R T I F I C A T I O N

I hereby certify that the foregoing pages are a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Judicial District of Waterbury, Waterbury, Connecticut, before the Honorable Barbara N. Bellis, Judge, on the 14th day of September, 2022.

Dated this 15th day of September, 2022, in Waterbury, Connecticut.

Kendyl Henaghan

Kendyl Henaghan
Court Recording Monitor